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ABSTRACT

In case studies of four upstate New York counties, school districts were ranked according to their implementation of state-mandated educational regulations, including the percentage of handicapped students receiving their education in districtwide programs. Findings reveal that officials from all districts perceived state official communications as confusing and contradictory. As a result, district superintendents viewed federal and state intervention negatively. Local officials from the two high percentage districts (A and C) felt their school staff were cooperative and responsive to district policy, in contrast to those in low percentage districts (B and D). While districts B, C, and D co-opted state requirements to fit existing organizational structures, district A adapted its policies and structures to meet the requirements. Although all districts were in compliance with state-mandated administration procedures, local officials from each district remarked on the need for constructive reviews of program quality. Findings suggest that while policy makers should provide means for assessing the actual quality of educational programs delivered to the handicapped, educators should encourage and seek the involvement of district personnel in their program operations. Further tasks for educational researchers include intensive analysis of a reputedly successful district and investigation of programs for handicapped students within their placement setting. (JBM)

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Local School District Implementation of State Mandated Educational Regulations, The Least Restrictive Environment Provisions: Implications and Recommendations for Policy Makers and Educators

by

Lorenzo Licopoli

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Abstract

The author discusses that compliance based implementation strategies do not insure that the targeted beneficiaries, in this instance students with handicapping conditions, actually receive the intended benefits of the least restrictive environment provisions. The implications, for policy makers and educators, are that bureaucratic compliance to administrative procedures does not mobilize the spirit of the policy. Recommendations are made for state policy makers and educators regarding the linking of substantive educational practice into policy statements.

LOCAL SCHOOL DISTRICT IMPLEMENTATION OF STATE MANDATED EDUCATIONAL REGULATIONS, THE LEAST RESTRICTIVE ENVIRONMENT PROVISIONS: IMPLICATIONS AND RECOMMENDATIONS FOR POLICY MAKERS AND EDUCATORS

by Lorenzo Licopoli

Introduction

Local school district implementation of state mandated educational policy has received much attention by policy implementation researchers. Research completed by Berman and McLaughlin (1976), Murphy (1971), Weatherly and Lipsky (1977), and Hargrove (1975) examined the transformation of policy decisions, by local implementors, into local services. It was learned through these studies that the "disposition" of the local implementors, in adapting to local conditions may affect the extent to which a policy is actually carried out.

With the passage of the Education For All Handicapped Children Act in 1975, the federal government introduced elaborate procedural requirements, to be implemented by local school districts and monitored by state education agencies, designed to assure that handicapped students are placed, based on their disability, in the "least restrictive environment." The implementation requirements of the least restrictive environment provisions are coupled with numerous compliance based implementation strategies that require local school district adherence to administrative rules and regulations. In order to understand the degree to which the provisions for the least restrictive

environment provide effective educational programs for handicapped students, it is necessary to turn the study of "policy" around and study how the policy and subsequent program was actually implemented at the local level (Lipsky, 1976; Patton, 1980; Pressman and Wildavsky, 1973; Weatherly and Lipsky, 1977).

In New York State, the provisions for the least restrictive environment are found in Chapter 853 of the Laws of New York (1976-1980) and in the Rules and Regulations of the Commissioner of Education (1976-1981). Similar to the federal mandates, the New York special education regulations require local school districts to implement educational procedures that presumably assure handicapped children access to an education in the least restrictive environment. The subject of this paper entails the presupposition that though school districts in New York State are provided with guidelines, which describe the procedures for placement of handicapped students in the least restrictive environment, the guidelines by themselves do not predict whether the behavior of local officials results in handicapped students actually receiving an effective education.

Briefly put, the argument is made that state policy, which evaluates local district adherence to administrative requirements, cannot measure or determine whether effective educational services are delivered to handicapped students. The rationale for this argument is based on the findings from the author's doctoral dissertation which comparatively described and explained the variations of four local school districts' responses to the implementation requirements of the least restrictive provisions for handicapped students in New York State (Licopoli, 1983). The objectives of this paper focus on

(a) summarizing variations of local response that resulted in two school districts having a high percentage of their handicapped students placed in district-wide programs, and two school districts having a relatively lower percentage of their handicapped students placed in district-wide programs, and (b) based on these variations, what are the implications for state policy makers who "make" policy and educators who actually implement the policy.

Background

In New York State, it is the intent of the law that the responsibility for assuring the placement of handicapped students in the least restrictive environment rests on the board of education (Role of Board Members, 1980). The board of education is required to appoint a Committee on the Handicapped (COH), whose members include a school psychologist, a teacher and/or administrator of special education, a parent of a handicapped child, a school physician (attendance is not required), and any person who the board feels is appropriate. This committee shall make recommendations to parents and the board as to the appropriate educational placement of each handicapped student (Sec. 4402).

Committee placement recommendations, described as a multidisciplinary effort, are determined by reviewing all relevant information pertinent to the child and setting forth their reasons for the placement to the child's parents (Sec. 4402). The board of education can authorize one of several special service programs that lie within a continuum of placement alternatives where one program is more restrictive than the preceding one. These program placements may be operated by the district, Boards of Cooperative Educational Services, other public schools, or approved non-public schools.

Each school district, through its COH, is required to adhere to numerous administrative procedures that include (a) due process procedures, (b) proper notification of parents, (c) parent participation in the COH placement process, and (d) the preparation of an individual educational program (IEP) for each handicapped student. The development of the student's IEP outlines the specific educational goals, needs, and objectives that are to be carried out in the subsequent placement.

Methodology

The findings reported in this paper were generated from a comparative case study of four school districts in a four county region in New York State (Licopoli, 1983). Data was collected through 84 structured open-ended interviews from among state officials, and board members, COH members, parents, school administrators and staff of the four districts. An extensive document review of all available district and state documents was also completed.

A comparative case study methodology was designed to explore local district response to implementation factors that were discerned from the policy implementation literature. These factors were grouped into a framework of five categories classified as: 1) Cognition, the degree to which local officials understand the guidelines and procedures for the least restrictive environment (Van Horn and Van Meter, 1975); 2) Goal Consensus, the degree to which local officials agree with the implementation requirements (Aldrich, 1979); 3) Implementation Strategy, the strategies used by local officials to implement the requirements (Berman and McLaughlin, 1976); 4) Implementor Treatment, the methods used by local officials to determine the appropriate placement of handicapped students (Berman and McLaughlin, 1976); and 5) School-Community Characteristics, the

perceptions of local officials, staff, and parents regarding the school and community environments that may have affected their districts' implementation of the requirements.

General Description of Districts A, B, C and D

Twenty-eight school districts in a four county region in Upstate New York were ranked in a distribution by the percentage of handicapped students receiving their education in district-wide programs. Districts A and C, designated as "maximal" districts, were considered as high percentage districts because they were above the centile rank of C75 of the distribution. Districts B and D, designated as "minimal" districts, were considered as low percentage districts because they were located between the centile ranks of C25 and C50 of the distribution.

The school superintendents in Districts A and B described their districts as "suburban" with a large population of white collar professional workers. District C's superintendent described his district as "small rural" with a varied population of commuter white collar professionals and farm related workers. The superintendent of District D described his district as "small city" with a large population of senior citizens and blue collar workers.

Characteristics of Districts A, B, C and D are shown in Table 1 and reflect information pertaining to the 1979-1980 school year (see Table 1, p. 6).

Summary of Major Findings

The findings reported below describe data obtained from (a) high percentage districts (maximal) A and C, and (b) low percentage

Table 1

Characteristics of Districts A, B, C and D

Characteristics	District A Maximal Suburban	District B Minimal Suburban	District C Maximal Rural	District D Minimal Small City
School Enrollment	5500	4100	900	1350
Number of Handicapped Students	320	230	95	160
Handicapped Students in District-Wide Programs	89%	51%	88%	60%
Number of High Schools	1	1	1	1
Number of Middle Schools	1	2	0	0
Number of Elementary Schools	5	4	1	1
FV/TWPU	$70,800	$65,000	$46,500	$51,000
Operating Expense Per Pupil	$ 2,000	$ 2,000	$ 1,350	$ 1,550

All figures are approximations except number of schools.
Data Source: New York State Education Department Bureau of Education Statistics for 1979-1980 school year.

districts (minimal) B and D. The findings are delineated by the category used in the framework of the original study.

Cognition: Degree of Local Understanding

1. State official communications were perceived by local officials from Districts A, B, C and D as confusing, difficult to understand, and contradictory.

2. School district personnel in maximal districts made further contacts with state officials in order to seek clarification.

3. Local officials from Districts A, B, C and D noted that state official communications did not provide them with

sufficient information to discern what the real goals of the policy were.

4. Local officials from Districts A, B, C and D explained that state sponsored workshops were ineffective and did not provide them with the assistance they needed.

Goal Consensus: Degree of Local Agreement

5. School district personnel in Districts A, B, C and D were not in agreement with the state compliance measures of district adherence to administrative rules and regulations.

6. Superintendents from each district viewed federal and state intervention into local decision making negatively.

7. Local officials from each district stated that the procedures to implement the provisions were not necessarily consistent with district procedures.

8. Local officials from each district found the provisions to be abstract and difficult to fully implement.

9. Local officials from Districts A, B, C and D indicated that the state laws should be changed in order to more realistically address district needs.

Implementation Strategy: The Degree of Change Effort

10. Neither Districts A, B, C nor D developed a formal planned implementation strategy.

11. Maximal District A utilized formal measures to disseminate district policy to staff and parents. Maximal District C utilized informal measures to disseminate district guidelines to staff and parents. Minimal Districts B and D did not take measures to inform staff and parents of their district policies.

12. Local officials in maximal districts made efforts to obtain feedback from staff and parents, however, local officials in minimal districts did not.

13. In maximal districts, the school psychologist and a central office administrator were in charge of developing the local policy in response to the implementation requirements of the least restrictive environment provisions. In minimal districts, a district-wide administrator was assigned the responsibility for developing the local plan.

14. Local officials in maximal districts made efforts to evaluate their implementation plan, however, local officials in minimal districts did not.

15. Parents in maximal districts were more informed of their district's policy than were parents in minimal districts.

Implementor Treatment: Present Operation of Plan

16. Districts A, B, C and D were in compliance with the state regulations.

17. School district personnel in Districts A, B, C and D felt that their districts were effective in placing handicapped children in the least restrictive environment.

18. Handicapped students among each of the districts were placed in out-of-district programs when their handicapped conditions required multiple services, threatened the safety and welfare of staff and students, and required intensive structure and counseling.

19. The committees on the handicapped from the surveyed districts approved the recommendations of their school psychologists; their board of education approved all of the COH recommendations.

20. Board members from each district stated that they did not feel sufficiently knowledgeable to make placement decisions.

21. Regular education teachers among the four districts were not knowledgeable as to how handicapped students are assessed and placed.

22. COH members from each district explained that their COH makes every effort to reach agreement with parents before finalizing a recommendation to their boards of education.

23. Board members stated that they are most concerned that parents are in agreement with the COH recommendation.

School-Community Characteristics: Staff and Parent Perceptions

24. Local officials from Maximal District A instituted monthly parent meetings. Districts B, C and D did not.

25. Local officials from Minimal Districts B and D stated they believed that parents preferred to be quiet about district programs for the handicapped.

26. Superintendents from the surveyed districts noted that insufficient staff and financial resources hindered the implementation of the requirements of the least restrictive environment.

27. Parents interviewed from Districts A, B, C and D did not recall receiving any information from state officials concerning their child's right to an education. Only parents from District A recalled that they received district communications concerning district policies.

28. Local officials from maximal districts felt that their school staff was cooperative and responsive to the district policy. Local officials from minimal districts felt that their school staff was unresponsive and resisted their implementation efforts.

The Variations of Responses Among Districts A, B, C, D

Berman and McLaughlin (1976) and Berman (1978) described three paths of possible implementation as the levels of mutual adaptation, cooptation, and non-implementation. Mutual adaptation was described as the adaptation of both the policy and local setting in meeting the requirements for the least restrictive environment. Cooptation occurs when the local setting adapts the policy to accommodate the existing organizational structure. Non-implementation occurs when no adaptation of the policy and local setting takes place. In each district, the effect of local official interactions with state officials and their staffs resulted in responses that impacted the extent to which the district implemented the requirements for the least restrictive environment. Cooptation of the requirements occurred in Districts B, C and D. Mutual adaptation was approximated in District A.

In Districts B and D, which were selected as minimal districts because they had a low percentage of handicapped students placed in district programs, those individuals in charge of implementing and operating the requirements for the least restrictive environment complied to these provisions by appointing a committee on the handicapped

and implementing the procedural components of the law. No efforts were made to change the behaviors of those impacted by the implementation of the local policy. Organizational change was not impacted by their districts' compliance to additional educational-procedural responsibilities mandated by the implementation requirements of the least restrictive environment provisions.

District C, though a maximal district, complied to the procedural elements of the provisions, but changes to its existing structures and routines were not discerned. Although this district appeared more successful in relaying the goals of the policy through its existing informal channels, new organizational behaviors were not observed.

District A, which was selected as a maximal district, approximated mutual adaptation by adapting existing structures to accommodate a district policy that was adapted from the state law. This district defined new modes of operation within and among its district schools. New roles, job descriptions, and staff responsibilities were developed. Alternative avenues of communication were also formed.

Major Conclusions

1. State officials did not clearly and specifically communicate the goals of the LRE to Maximal Districts A , C and Minimal Districts B, D.

2. The role of the board of education, as described by state officials and state documents, was not carried out by board members of the surveyed districts due to: a) time constraints, and b) their lack of sufficient knowledge concerning placement decisions.

3. The key actor in the placement of handicapped children is the school psychologist. The knowledge possessed by this individual and the role this individual plays in the COH process has the most bearing on placement decisions of handicapped children.

4. State official monitoring of the surveyed districts' compliance to the least restrictive environment provisions did not evaluate the quality of the actual programs.

5. The key differences between maximal districts and minimal districts were that local officials in maximal districts: a) appeared to be more in agreement with the "spirit" of the regulations, b) made efforts to inform staff and parents, and c) made efforts to seek feedback and evaluate their districts' program.

Discussion

The argument put forth in this paper was that local district adherence to administrative requirements and evaluation of that adherence by state officials cannot determine whether effective educational services are being delivered to handicapped students. The argument is not based on whether local districts satisfied the implementation requirements of state law, but how the policy chain process impacts the education of handicapped children. That is, does the group receive the presumed benefits of the policy?

Compliance Based Implementation Strategy

The reported findings point out that though each of the surveyed districts was in compliance with the state mandated laws, their compliance was only a measure of their districts' adherence to administrative paper-related procedures. Local officials across the districts explained that state official monitoring of this compliance did not capture the real local program within the district.

It appears evident that the dominance of compliance factors, embedded in the federal and state policies, required local school districts to implement administrative procedures and did not evaluate nor review the actual delivery of educational services to handicapped children. The state policy requiring the implementation of the least restrictive environment provisions for handicapped children assured

this group delivery of law, procedures, and regulations. It remains problematical whether the local implementing districts learned to adopt and operationalize the presumed benefits of an educational reform calling for the educational improvement of handicapped children.

The success of this policy is determined by state officials who measure the extent to which local districts adhered to and implemented procedures for identifying, diagnosing, and placing handicapped students. Compliance to mandated administrative procedures as a measure of policy success raises problems as to the original intent of the laws mandated by PL 94-142.

The enactment of PL 94-142 was framed by a legal-constitutional right for handicapped children to receive a particular kind of treatment that would presumably result in certain benefits to this group. The law entitled handicapped children to this right. Subsequently, it provided minimal federal assistance to the implementing agencies and required them to reallocate their resources toward the handicapped so that this population would receive equal treatment under the law.

The agency targeted with the responsibility for developing and implementing the federal policy was the local school district. The state agency was responsible for implementing guidelines, consistent with federal law, and for monitoring local districts thereby insuring their compliance with the guidelines. The federal policy required those agencies, who were once presumed to have neglected the targeted group, to deliver educational services to handicapped students with marginal federal and state assistance.

It was evident that Districts A, B, C and D had difficulty in determining what the educational practice of the least restrictive

environment means. Respondents across the districts noted that they were uncertain as to whether the concept of the least restrictive environment was based on substantive educational theory or whether it was a legal term defining placement. It was also found that state official communications in the form of handbooks, information bulletins, workshops, and on site evaluations did not clearly address the uncertainty nor provide the expertise that specifically defined least restrictive environment.

The policy makers, in effect, left the problems of delivering effective educational services to the actual implementor. The real mobilization of this policy was dependent on those individuals in school districts who made decisions concerning their understanding of what the policy intends to accomplish. The actual implementors of the policy, the local school districts, became the real policy makers with respect to determining what is actually delivered and taught to handicapped students.

Compliance based policy implementation strategies that are coercive may displace the knowledge of those officials, who may or may not have the competence to implement the policy goals, by their taking actions to merely satisfy local adherence to compliance regulations. Policy implementation cannot be successful unless local officials take actions to make it successful. An alternative to compliance based strategies is a policy implementation strategy that is normative based and uses compliance as a means of making various officials aware of the problem and, yet, provides them with ample knowledge and practical assistance to implement the policy.

Determining the Real Success of the Policy

Local officials from Districts A, B, C and D noted that state evaluations should provide constructive reviews of program quality and not just monitor district adherence to procedural guidelines. The negative attitudes of local officials concerning the state policy centered on the following issues:

1. The state's monitoring of district compliance to bureaucratic procedures.
2. The lack of state assistance in providing knowledge as to the actual goals of state mandates.
3. Local officials perceived that state officials were negligent by not reviewing actual district programs.
4. The lack of staff and financial resources needed to achieve full implementation.
5. The cost to the district of complying with the regulations and providing the mandated services without ample state financial assistance.

The comments of one superintendent embrace the concerns that were shared by school district personnel from the other districts:

> The education for handicapped children is more than numbers. State officials tell the district what to operate and yet do not define what the district really is to do. The district is responsible for an undefined goal that is measured by compliance. State Education Department officials subvert the policy. Their evaluation process is not constructive . . . they measure things in process not in quality. The mere compliance of a given district does not mean that the district is providing a quality program. The administrative cost and energy that is used is counterproductive and not efficient. (Interview, 12/28/81)

To accurately determine whether handicapped children are receiving the benefits of the least restrictive environment, an environment that presumably does not restrict their educational improvement, one needs to discern the actual program of the student. This can be determined by: 1) the competence and knowledge of school district personnel

who, through the COH, assess, place, and teach handicapped children, 2) the location and type of class, 3) the actual program that is taught, and 4) the implementor's evaluation of the placement and program based on measures of potential student improvement.

District needs toward the full implementation of delivering the actual benefits of the policy were encompassed in the general area of "assistance" in the form of: 1) knowledge, 2) financial and staff resources, and 3) constructive evaluation of actual program delivery. If this assistance was provided to local districts, as a rational marker of policy success and effectiveness toward delivering educational services to handicapped children, the benefits of the policy could more readily be assured.

As discussed earlier, the variations of local response to the implementation requirements of the least restrictive environment provisions found three districts in which cooptation occurred and one district which approximated mutual adaptation. It may very well be that among the three districts that experienced cooptation, the costs of full implementation, found in financial, staff, and organizational adaptations, exceeded the presumed benefits of the policy.

One factor that distinguished three districts from the district which approximated mutual adaptation was that key personnel in this district took immediate responsibility for implementing the program and essentially governed themselves. Although their mutual adaptation suggests that the benefits of the policy are being delivered, it appears evident that district adherence to compliance based implementation strategies cannot directly ascertain whether beneficiaries targeted in this district actually received those benefits.

This paper focused on local district response to the implementation requirements of the least restrictive environment provisions. The description and explanation of local district implementation of compliance based state policy cannot directly address the policy questions of who benefits nor whether the targeted group received the benefits of the policy.

Implications for Policy Makers and Educators

In the course of analyzing the findings and insights that were drawn from the comparative analysis, the researcher has formulated several presuppositions that serve as implications for (a) policy makers, who develop policy value into law, and (b) educators, who transform policy decisions into delivery systems. The implications are:

1. The extent of bureaucratic compliance by local districts and evaluation of that compliance by state officials, who monitor local adherence to state mandated administrative procedures, is not related to the perceptions of local officials regarding the quality or assurance of benefits to targeted students.

Local district compliance to administrative procedures does not measure the quality of the actual educational program delivered to handicapped students. The mobilization of the spirit of the policy is dependent upon the local officials who administer and teach in the schools.

2. Though effective implementation suggests a mutual adaptation between the local district and the state policy, mutual adaptation in itself does not assure that the targeted group is actually receiving the benefits of the policy.

The policy implementation literature suggests that effective organizational change corresponds to effective policy implementation. The effective delivery of educational services to handicapped students cannot be determined through the examination of local change efforts in response to compliance based state mandated implementation strategies.

3. The constructive evaluation of: a) COH decisions, and b) the actual educational placement and program may determine whether the beneficiaries of the policy are receiving the benefits of the policy.

The real marker of policy success may be determined by an assessment of the student's actual program. This process may discern whether the outcome of the policy, the delivery of educational benefits, actually reaches the targeted group.

4. Local district response to centrally controlled policy implementation by the federal-state agency may induce uncertainty and distance between the local setting and its fulfilling the desired goals of the policy.

Centrally controlled policy in the form of local compliance to administrative procedures may result in districts experiencing uncertainty as to what they are actually to accomplish for handicapped students. The centralized coordination of local officials by state officials conflict with the local district's need of having discretionary responsibility for operating their programs.

5. Government implementation strategies that provide substantive assistance may enable districts to effectively deliver the benefits of the policy to the targeted beneficiaries of the policy.

The basis for the negative attitudes expressed by local officials in response to the state mandated policy was that the policy lacked substantive educational soundness, and that compliance as a marker of success was inappropriately enforced by the regulatory power of state officials. Local officials viewed state officials as compelling their districts to implement an "ill-conceived" policy under the threat of federal-state punitive sanctions. Policy implementation was not based on an identifiable normative value that encouraged local commitment to the spirit of the policy. The needs identified by local officials

called for ample federal-state assistance regarding their access to: 1) knowledge of what the goals of the policy are, and 2) resources to effectively train staff and support their implementation efforts.

6. The centralized-bureaucratic control of policy implementation, which suggests new roles for local organizational members, conflicts with the decentralized need of local districts to coordinate their members in their response to educational policy. This conflict may impact the: a) conventional bureaucratic roles of organizational members at the local level, and b) policy choices made by organizational members.

The key network which "actualized" policy implementation was found among the personnel of the local districts. It was found that the key actor in this network was the school psychologist. Collectively, individuals in each local district were held "accountable" to establish different organizational processes while their new roles in the organization suggested a departure from the traditional roles they were accustomed to. The role of the school psychologist emerged as central to the placement of handicapped students, whereas the role of the director of special education diluted the conventional domain of the principal in the districts.

Policy choices which affected the level of policy implementation were dependent upon the mixture of certain actors within each district. In the two "maximal" districts, each school psychologist and central office administrator appeared committed to the spirit of the policy. In the two "minimal" districts, each of the directors of special education did not appear committed to the spirit of the policy.

Recommendations for Policy Makers

The correspondence between policy, its rules and regulations, and delivery of educational services should be linked by the normative value

of providing effective educational programs. It appears logical that the policy maker, in this instance state officials who developed the rules and regulations which govern the implementation requirements of the least restrictive environment provisions, should base educational policy on substantive educational theory and practice. It would appear that this strategy would be more reliable in assuming that the targeted beneficiaries of the policy, handicapped students, receive the benefits of the policy.

The recommendations for policy makers in the State Education Department, are:

1. It is recommended that State Education Department officials review their methods for evaluating local compliance to the requirements of the least restrictive environment and develop evaluation techniques that measure the programmatic compliance to the least restrictive environment provisions.

State officials can aid district personnel, parents, and children with handicapping conditions by concentrating their evaluation methods on the actual placement of children and not on just whether the districts are bureaucratically in compliance with administrative procedures. Bureaucratic evaluation should be secondary to the programmatic issues of the placement. Constructive evaluation of placement practices at the local level could provide positive feedback and suggestions that a local district program could utilize in future placement decisions.

2. It is recommended that State Education Department officials review the concept-construct of the meaning of the least restrictive environment. Specifically, an operational definition that identifies the means-end relationship of what the concept least restrictive environment entails may better insure that the effective placement of handicapped students is attained.

The findings in this paper suggest that the least restrictive environment means that the preferred placement is within a district program. It was also evident that this preference sometimes prevents school

district personnel from recommending, in their view, more effective out-of-district placements. This discernment of the logic and operational definition of least restrictive environment should define whether the desired placement is in district programs or where the most effective services exist so that the child is not educationally restricted. In other words, is least restrictive placement based on a continuum of services where one service is less restrictive than the preceding one, or is it the effective educational environment that improves the educational growth of a handicapped student.

3. It is recommended that a lateral-horizontal network between local school districts and the State Education Department be created in order to reduce the negative effects of the vertical network that may undermine the effective delivery of services to the intended beneficiaries of the policy.

Districts A, B, C and D experienced barriers to effective policy implementation regarding the issue of compliance based implementation and not the goals of the policy. Uncertainty was evoked by district perceptions of scarce resources and by the actual meaning of the policy. This impacted district implementation with respect to making judgments toward mobilizing the cooperation and responsiveness of staff and generating the revenues necessary to operate the district program.

Horizontal networks between the state and local agencies should encourage a broader normative value of local attainment of the real objectives of the policy. This network should be amply supported by state officials providing a variety of assistance programs. Such programs can be designed to provide the technical assistance to board members, administrators, staffs, and parents in their understanding the requirements for the least restrictive environment provisions. Statewide programs could aid districts in coordinating local officials with respect to the means-end relationship of the various components of the policy. The identification

of the means-end relationships may alleviate the problems of intra-district communications and communication distortions between the State Education Department and local school district personnel.

State officials should be ready to support these needs with the necessary monies to ensure their success and effectiveness. The cooperation of the many actors involved with the placement of handicapped children may hasten the implementation process and facilitate the achievement of the desired goal of the policy.

The coupling between state and local agencies could be conducted by regionally sponsored state operated workshops for school district personnel. Objectives of such workshops may bridge gaps in communication and provide a forum for reaching solutions to local problems. Furthermore, components of these workshops should include programs that deal with leadership behavior in an unresponsive environment.

4. It is recommended that role definitions and qualification criteria for COH membership be identified by State Education Department officials and that such criteria serve as the basis for the board of education to appoint COH members.

The role of the local committee on the handicapped is central to the classification and placement of handicapped children in the least restrictive environment. Though state officials presently disseminate a handbook for COH members that describes their roles, the handbook itself does not describe the competencies that are necessary to fulfill these roles. The handbook does not describe how the COH actually should make decisions, and, as reported in this paper, the school psychologist's decision was rubber-stamped by COH members and board members.

Members of this committee may not be familiar with evaluation techniques and various classification and placement options. This

recommendation may lessen the ambiguity of committee membership and insure that the board of education has selected a COH that is cognizant and knowledgeable of the evaluation techniques and of various classification and placement options. The identification of group consensus decision making techniques is suggested in order to insure the effective involvement of group members.

5. It is recommended that State Education Department officials review the role of the board of education and/or make revisions that clarify or modify the function of board members pertaining to the education of the handicapped.

The mandates that describe the role of the board of education are unclear as to whether the board, through educational decision making process, is the group that determines placement, or whether they should simply have knowledge of the COH recommendation for their authorization.

This paper discussed that board members were dependent upon the school psychologists' recommendation to the COH. Each member was quite candid in pointing out his/her lack of familiarity with evaluation methods and the educational meanings of various classification labels and placement options.

6. It is recommended that the State Education Department conduct an independent evaluation of classification and placement options that will provide substantive information in order to clearly define and, if necessary, revise the regulations and procedures.

Many interviewees from the districts felt that problems of classification and placement options arise over issues such as class size and mixing of students with varying handicapping conditions in different "types of classes." The researcher was uable to discern through interviews conducted with state officials the substantive basis for these regulations. If substantive educational data validated the necessity of the

provisions, as related to the required decision making process that resulted in placement, it may hasten local implementation.

7. It is recommended that the various offices within the State Education Department coordinate their activities so that communications being delivered to local districts are consistent, clear, and do not contradict each other.

Respondents from the districts indicated that state official communications were unclear. They appeared to come from many different "offices," from different individuals, and were perceived as confusing to understand. The document review in the original study identified volumes of information that encompass federal and state laws, state regulations, state handbooks, and state official memos that are disseminated to school districts. Much of this information pertained to revisions and interpretations of previous information. Moreover, many of the handbooks contained information that could not be supported at the time by the existing laws and regulations. The continual revisions and lack of consistency among state official documents may be a source of district problems in understanding the goals of fully implementing the requirements for the least restrictive environment.

Recommendations for Educators

Local district compliance to administrative regulations may displace the goals of the policy because local officials, who may or may not have the competence to implement the policy, may merely comply to the letter of the law rather than to the spirit of the law. Local districts need to recognize that efforts toward staff involvement may hasten their commitment to the district's goals of providing educational services for handicapped children. Educational researchers also need to concentrate their efforts on the programmatic aspects of effective

delivery of educational services and its impact on the conventional-bureaucratic domain of public schools.

The recommendations for educators are:

1. It is recommended that local officials design staff development programs in order to assure that the goals and objectives of the least restrictive environment provisions are meaningful to the district personnel, who are central to placement decisions, and to those who are influenced by placement decisions.

Maximal districts evidenced more openness toward communicating the district policy to staff and were more willing to encourage and seek the involvement of district personnel in their operation of programs. Staff involvement was desired by all regular education teachers who were effected by placement decisions which resulted in handicapped students being mainstreamed in their classes.

Building principals were uninvolved in the programmatic issues of placement. These individuals did not feel involved nor did it seem they were expected to be involved. Their isolation from the program evoked negative attitudes which were reflected in their lack of understanding of the non-standard decisions that encompass the classification and placement of handicapped children.

Many special education personnel felt isolated from the decision making process. They viewed their superordinates and regular education personnel as unsympathetic.

Administrators, teachers, board members, and parents seemed to have their own individual agenda concerning the education of handicapped children in the least restrictive environment. Evidently, singularity of the mission was difficult to discern.

To successfully achieve the desired goal of providing effective educational services, it seems necessary that when the impact of decisions

crosses boundaries, those individuals who are influenced by them should be involved. Staff involvement programs could increase probability that the level of understanding and ownership of the placement decisions is consistent with the goals and objectives of the district program.

2. It is recommended that school districts develop a parent handbook which describes local district policy and procedures concerning the district's program for providing educational services to handicapped children.

The recommended handbooks should include information specific to the district's policy and procedures available to handicapped children. Parents need to have information which acquaints them with district personnel, the various roles and responsibilities staff have in the education of their child, the various forms that are used, how they are used, and in simple terms, the meaning of the educational language used in various evaluations and assessments.

Recommendations for Educational Researchers

1. It appears evident that considerable ambiguity exists between the roles of COH members and board members regarding their interactions which result in the placement of handicapped children. To explore this problem, it is recommended that an intensive observation and interview study be conducted of one reputed successful district. A study of these interactions in one school system over time could generate knowledge that would address the issues of decision making, leadership, communication, and evaluation of actual placements of handicapped students.

2. This paper discussed that the present methods of evaluating the assumed appropriate educational placements of handicapped children does not measure whether the real policy objectives are met. An investigation that deals with programmatic evaluations of handicapped students within their placement setting, and the effectiveness and use of the Individual Educational Program instrument, could bring forth knowledge that identifies the effects of class size, mixing of students, mainstreaming, and types of classes on the education of handicapped children.

3. Findings reported in this paper have underscored the negative feelings of local school officials toward state governments overregulating their districts, making them responsible for bureaucratic procedures that they have limited input, and for not allocating appropriate levels of resources to implement state policy. It is proposed that a policy study of the legislative branch of government and its interactions with the State Education Department be conducted. This type of study should deal with the path of policy from the legislature to state officials who are charged with developing the procedures that local districts are to implement. A companion study should deal with the regulatory power of the State Education Department in relationship to local districts, by addressing the concerns of goal consensus, district capacity to implement, scarcity of resources, and local district uncertainty regarding the intent of the legislation as manifested and expressed by the state education agency.

4. Each of the local school districts referred to in this paper, complied to the regulations that were disseminated in written form by state officials. The lack of clarity that local officials found in the communications may be attributed to various offices in the State Education Department. Moreover, since this study only dealt with the least restrictive environment provisions, there are also volumes of information concerning due process procedures, individual education programs, screening processes, and private school education regulations. It is proposed that a two-stage intensive study of the interactions within the State Education Department regarding the education of handicapped students be conducted. The first stage of this study should be an extensive document review of all the information that has been diffused to school districts. This information should identify the similarities and differences among the documents. The second stage of this study should examine how state officials coordinated their activities that resulted in the decisions and procedures that were identified in written form from stage one of the study. This study may bring forth information on how state education agencies make decisions, communicate to local implementors, and may further assist policy makers in understanding how law is implemented by the local agency.

5. The understanding of organizational dynamics is critical to policy research. A methodological concern of organizational analysis is whether the unit of analysis should focus on the role of the local district as an institutional entity in response to state policy, or whether the focus should be on the actors within the institution who decide on how they will carry out the policy objectives. This paper put forth the presupposition that centrally controlled policy impacted the standard operating procedures of particular organizational members within the local organization's response to state policy. Evidently, the school psychologist emerged as the key actor within the key network, the local district, by making educational

decisions that bypassed the roles of the COH, board of education, teachers, and building-wide administrators. It is proposed that a study be conducted that connects the methodological focuses of policy research by investigating inter- and intra-organizational politics. It is recommended that this type of study investigate a pool of key actors within the context of the local network in response to state policy. This study should examine the discrepancy between the key actor and what conventional bureaucracy demands within a school system in response to the meaning of policy in actual practice. This study could bring forth knowledge that describes and explains: a) how the actual resource exchanges of the policy impact local personnel, and b) the pragmatic meaning of quality organizational practices toward the carrying out of the perceived spirit of the policy in the local context of compliance. An outcome of this study may provide students of policy analysis valuable insights regarding the policy choices organizational members make within the arena of bureaucratic politics.

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